

LAW OFFICES
MORGAN, LEWIS & BOCKIUS LLP
101 Park Avenue
New York, New York 10178
(212) 309-6000

1701 Market Street
Philadelphia, PA 19103
(215) 963-5000

ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Civil Action No. 07-CIV-3769

CARMELO MILLAN, individually, and on Behalf
of All Other Persons Similarly Situated,

Plaintiffs,

vs.

CITIGROUP, INC.,
CITIGROUP TECHNOLOGY, INC.

Defendants.

Electronically Filed

AFFIDAVIT OF SARAH PONTOSKI

STATE OF PENNSYLVANIA)
)
) ss.
COUNTY OF PHILADELPHIA)

SARAH PONTOSKI, being duly sworn, deposes and says:

1. I am associated with the law firm of Morgan, Lewis & Bockius LLP, attorneys for the Defendants, Citigroup Inc. and Citigroup Technology, Inc., in this proceeding. I am resident in the firm's Philadelphia office, located at 1701 Market Street, Philadelphia, Pennsylvania 19103 and submit this affidavit in support of Defendants' Reply Brief In Further Support Of Motion For Summary Judgment.

2. Attached as Exhibit J is a true and correct copy of select pages from Thomas Saranello's deposition transcript.

3. Attached as Exhibit K is a true and correct copy of select pages from Amedeo Discepolo's deposition transcript.

4. Attached as Exhibit L is a true and correct copy of select pages from Plaintiff's deposition transcript taken.

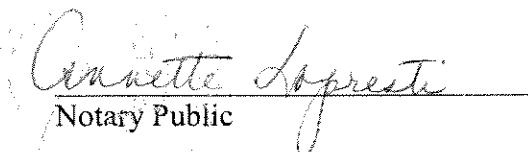
5. Attached as Exhibit M is a true and correct copy of select pages from the NISS Policies and Procedures Manual.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Philadelphia, Pennsylvania
April 1, 2008


Sarah Pontoski

Sworn to and subscribed before
me this 1st day of April, 2008.


Annette Lopresti
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Annette Lopresti, Notary Public
City Of Philadelphia, Philadelphia County
My Commission Expires June 24, 2010

Member, Pennsylvania Association of Notaries